

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**JOINT STIPULATION IN RESPONSE TO
COURT ORDER ECF 3786**

This Document Relates to:

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Jaylynn Dean v. Uber Technologies, Inc., et al.,
No. 3:23-cv-06708

The Parties respectfully submit this joint stipulation in response to the Court's Order. *See* ECF 3786. The Parties met and conferred in compliance with the Court's Order pertaining to the *Dean* case as set out in ECF 3786 and reached the following agreements:

1. The Parties agree that by September 12, 2025, Plaintiff and non-party witnesses B.F., E.G., J.D., and D.S. (each of whom are represented by counsel for Plaintiff) will each submit verified declarations complying with ECF 3786, which will include a description of (1) what steps were conducted to search for any requested information; (2) what steps were conducted to preserve any requested information; (3) what steps were conducted to replace, wherever feasible, allegedly lost documents obtainable through third-party sources; (4) what they knew about whether their messages were preserved on particular devices, backup systems, and messaging and social media platforms; and (5) when they were informed of their duty to preserve requested information.
2. The Parties agree that by September 16, 2025, Defendants will notify Plaintiff as to its position on whether the depositions of the Plaintiff, B.F., E.G., J.D., and/or D.S. should be reopened.
3. The Parties agree that if the Defendants request to reopen any of the depositions after reviewing the declarations, the parties will meet and confer on this issue by September 19, 2025.

Respectfully submitted,

DATED: September 5, 2025

By: /s/

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